UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

January 27, 2014

Sandra E. Stiles
U.S. Army Corps of Engineers
CEMVN-PDN-CEP
P.O. Box 60267
New Orleans, LA 70160-0267

Ms. Stiles,

In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the U.S. Army Corps of Engineers (USACE) Draft Integrated Feasibility Report and Programmatic Environmental Impact Statement (PEIS) for Southwest Coastal Louisiana. The purpose of the proposed action is to provide non-structural hurricane and storm surge risk reduction measures, as well as, ecosystem restoration features in southwest Louisiana.

EPA rates the DSEIS as "**EC-2**" i.e., EPA has "environmental concerns and requests additional information" in the Final PEIS (FPEIS). The EPA's Rating System Criteria can be found at http:/www.epa.gov/compliance/nepa/comments/ratings.html. The "EC" rating is based on the potential for adverse impacts to protected species and coastal resources. The "2" indicates the DSEIS does not contain sufficient information to fully assess protected species and coastal resources. Responses to comments should be placed in a dedicated section of the FEIS and should include the specific location where the revision, if any, was made.

EPA appreciates the opportunity to review the PEIS. Please send our office one copy of the FEIS when it is electronically filed with the Office of Federal Activities. This letter will be published on the EPA website, www.epa.gov, according to our responsibility under Section 309 of the CAA to inform the public of our views on the proposed Federal action. If you have any questions or concerns, I can be reached at 214-665-8006, or contact Keith Hayden of my staff at hayden.keith@epa.gov or 214-665-2133.

Sincerely,

Rhonda Smith
Chief, Office of Planning
and Coordination

DETAILED COMMENTS ON THE
U. S. ARMY CORPS OF ENGINEERS
DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT
FOR SOUTHWEST COASTAL LOUISIANA

BACKGROUND: Southwest Coastal Louisiana (SWCL) communities are at increasing risk to storm surge flooding due to wetland loss, relative sea level rise, and land subsidence. The SWCL project proposed by the U.S. Army Corps of Engineers, Mississippi Valley Division, New Orleans District, will provide nonstructural hurricane and storm surge damage risk reduction measures as well as ecosystem restoration features in the 4,700 square mile study area located in Calcasieu, Cameron, and Vermilion Parishes in southwest Louisiana.

Proposed measures of the National Economic Development (NED) nonstructural plan include residential structure elevation, flood proofing, and the acquisition of qualifying structures to reduce potential damages from future tropical storms and hurricanes. The National Ecosystem Restoration (NER) plan includes nine marsh restoration measures which would restore 8,579 acres and nourish 4,026 acres, resulting in 8,714 net acres; two hydrologic and salinity control measures to restore 6,092 net acres; five shoreline protection measures that protect 5,509 net acres of shoreline and which would span 266,884 linear feet; the preservation of the historic Sabine Lake oyster reef, and a Chenier reforestation program that includes invasive species control and planting seedling trees on 1,413 acres in multiple locations in Cameron and Vermilion Parishes.

RECOMMENDED FORMAT

Table of Contents

The table of contents section numbers, titles, and page numbers do not correspond to their actual location in the PEIS. In some instances, sections listed in the table of contents cannot be found in the PEIS. This makes review of the PEIS difficult.

Recommendation:

Make sure section names and numbers listed in the table of contents match what is found throughout the document. In addition, make sure the page numbers listed in the table of contents are more specific than "page 1 of the chapter".

3.0 ENVIRONMENTAL CONSEQUENCES

3.7 Mitigation

It should be noted that the Lake Charles Metropolitan Statistical Area is vulnerable to being designated as non-attainment for ozone and particulate matter (PM) in the next few years. The Imperial Calcasieu Regional Planning & Development Commission (IMCAL), representing

Calcasieu Parish, Cameron Parish, the Cities of Lake Charles, Westlake, Sulphur, Vinton, DeQuincy, the Town of Iowa, the Lake Charles Harbor and Terminal District, the Chennault International Airport, the Lake Area Industrial Alliance, the Southwest Louisiana Economic Development Alliance, and the Chamber SWLA has applied for and been accepted by EPA into the EPA Ozone Advance and PM Advance programs. The Advance programs are collaborative efforts between EPA, states and local governments to enact expeditious emission reductions to help near non-attainment areas remain in attainment of the NAAQS. This reflects the sensitivity of ozone and PM levels in the area, and the need for federally-funded projects in the study area to consider air emissions.

This section suggests as a mitigation measure for air quality impacts the use of "heavy machinery fitted with approved muffling devices that reduce noise, vibration, and emissions". EPA agrees with this suggestion as a potential mitigation measure, but also recommends consideration of measures to address fugitive dust related to construction activities.

Recommendation:

In addition to all applicable local, state, or federal requirements, the following controls are provided to illustrate a range of possible measures for reducing impacts associated with emissions of NOx, CO, PM, SO_2, and other pollutants from construction-related activities:

Fugitive Dust Source Controls:

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate at active and inactive sites during workdays, weekends, holidays, and windy conditions;
- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions; and
- Prevent spillage when hauling material and operating non-earthmoving equipment and limit speeds to 15 miles per hour. Limit speed of earth-moving equipment to 10 mph.

Mobile and Stationary Source Controls:

- Plan construction scheduling to minimize vehicle trips;
- Limit idling of heavy equipment to less than 5 minutes and verify through unscheduled inspections;
- Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels, prevent tampering, and conduct unscheduled inspections to ensure these measures are followed;
- If practicable, utilize new, clean equipment meeting the most stringent of applicable Federal or State Standards. In general, commit to the best available emissions control technology. Tier 4 engines should be used for project construction equipment to the maximum extent feasible;
- Lacking availability of non-road construction equipment that meets Tier 4 engine standards, the responsible agency should commit to using EPA-verified particulate traps, oxidation catalysts and other appropriate controls where suitable to reduce emissions of diesel particulate matter and other pollutants at the construction site; and

- Consider alternative fuels and energy sources such as natural gas and electricity (plug-in or battery).

4.0 TENTATIVELY SELECTED PLAN (TSP)

4.2.1 Description of the NER TSP

The ecosystem restoration component of the Southwest Coastal Louisiana plan includes shoreline erosion reduction measures. The use of rocks and other hard materials for shoreline erosion reduction can provide targeted environmental benefits for important landscape features. Such measures can also have unintended adverse effects due to alteration of sedimentation patterns (which, for example, can increase erosion in unprotected areas) and reduced fish access.

Recommendation:

Subsequent project-specific NEPA documentation for shoreline erosion projects should assess such potential unintended adverse impacts and include mitigation measures as appropriate. This could possibly include the use of alternative "soft" approaches to shoreline erosion reduction and "fish dips" to allow for greater ingress and egress of aquatic organisms.

5.0 ENVIRONMENTAL LAWS AND COMPLIANCE

5.1 Status of Environmental Compliance

Coordination with several county, state, and national agencies concerning environmental laws and executive orders is ongoing, and is not expected to be completed until after the FPEIS is released. EPA understands this is a PEIS, and that subsequent NEPA documentation and consultation will take place once individual elements of the TSP are implemented, but this does not absolve USACE from compliance with consultation requirements. Without specifics, and the available opinions of the agencies USACE is tasked with consulting, it is difficult to assess the potential environmental effects of the PEIS.

Recommendation:

EPA asks that USACE not release the Final PEIS until coordination with all local, state, and national agencies is finalized. This will allow the public and other interested parties a chance to fully evaluate the PEIS.

6.0 PUBLIC INVOLVEMENT

6.4 Other Public Coordination Efforts

Even though the EJ analysis suggests that no disproportionate high and adverse impacts will occur to minority and low-income populations during the construction and normal operation, care should be taken to provide opportunities for public involvement and participation to ensure

that EJ communities understand the plans, direct impacts, indirect impacts and cumulative impacts to their health and the environment.

Recommendation:

Information about this project, its location and the potential impacts upon its completion should be provided to the communities. The community should have opportunities to participate, ask questions, and voice opinions to those who plan the construction.

GENERAL COMMENTS

USACE "SMART Planning" Process

The USACE has applied its "SMART Planning" approach to the development of the Southwest Coastal Louisiana feasibility study and associated NEPA documentation. This streamlined planning approach was also used for the West Shore Lake Pontchartrain feasibility study. Whereas the West Shore Lake Pontchartrain study was accompanied by a project-specific EIS, the potential impacts associated with the Southwest Coastal Louisiana study are being assessed with a programmatic EIS. The use of a programmatic EIS appears to be more compatible with SMART Planning as currently being implemented, given the data and analysis limitations inherent in this new approach to streamlining project planning. The use of a programmatic EIS enables the USACE to identify a preferred course of action at the programmatic level, while deferring more detailed alternative analysis and environmental impact assessment to subsequent project-specific NEPA reviews.

NED and NER Plans

In the Southwest Coastal Louisiana study and draft programmatic EIS, the USACE has recommended a combination of ecosystem restoration and non-structural flood risk reduction measures for the study area. The proposed plan does not include structural flood risk reduction measures (such as levees); because the USACE assessment did not identify any such measures with a positive benefit-to-cost ratio. The combination of ecosystem restoration and non-structural approaches has the potential to reduce flood risk, minimize adverse environmental impacts, and protect and restore valuable coastal wetlands. Reliance on non-structural means for reducing flood risk generally poses substantially less environmental risk than structural approaches. The combined approach in the Southwest Coastal Louisiana study is the most environmentally friendly.